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December 22, 2023

Honorable Magistrate Judge Katherine H. Parker
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007

By Friday, December 29, 2023, Plaintiff shall file a letter response to Defendant's letter motion requesting preclusion of medical evidence based on Plaintiff's failure to produce medical authorizations. Plaintiff's response shall explain which authorizations are outstanding and why those authorizations were not provided by the deadline. Additionally, the Court advises that the correct docket number for this case is 23-cv-3672.

RE: KRISTY HINES
vs. THE STOP & SHOP SUPERMARKET COMPANY **SO ORDERED:**
Case Number: 1:22-cv-07782

Dear Honorable Magistrate Judge Parker:

Katherine H. Parker
HON. KATHARINE H. PARKER
UNITED STATES MAGISTRATE JUDGE 12/26/2023

Our office represents the Defendant, The Stop & Shop Supermarket Company LLC, in this matter.

The Court issued an Order on December 6, 2023, that Plaintiff was to produce all outstanding authorizations by December 15, 2023.

To date, the outstanding authorizations have yet to be received.

Our office did have an in-person conversation with Plaintiff's counsel, Ms. Jean-Jacques on December 14, 2023, regarding such and yet nothing has been received.

This failure to cooperate with the exchange of medical authorizations in a timely fashion greatly affects the Defendant's ability to move forward with the deposition of the Plaintiff and to have the same completed by February 28, 2024.

At this time, defense counsel is requesting preclusion of medical evidence as Plaintiff has refused to obey several court directives regarding disclosure. In the alternative, should subpoenas need to be served to obtain the requested medical records, we request that Plaintiff should reimburse our office for the cost of such in order to obtain the records in a timely fashion.

Defense counsel is willing to discuss further with the Court during a telephone conference after January 2, 2024, or at the in-person conference on January 9, 2024.

Very Truly Yours,

Sasha S. Shafeek
SASHA S. SHAFEEK (6348)

SSS:ms

cc: Michelle Jean-Jacques, Esq.
via e-mail at: mjnjacqueshlr@gmail.com